

Teny Geragos

From: Teny Geragos
Sent: Thursday, June 5, 2025 10:12 AM
To: Jason A. Driscoll; SubramanianNYSDChambers
Cc: Marc Agnifilo; thesteellawfirm; nw@westmorelandlawgroup.com; xdonaldson; Anna Estevao; Alexandra Shapiro; Comey, Maurene (USANYS); Johnson, Emily (USANYS) 2; Slavik, Christy (USANYS); Steiner, Mitzi (USANYS); Smyser, Madison (USANYS); Foster, Meredith (USANYS); Jason A. Driscoll
Subject: Re: US v. Combs - Letter re Jane GX

Dear Chambers,

We are withdrawing on GX A-104-15. That was my mistake and oversight.

Teny R. Geragos

From: Teny Geragos
Sent: Thursday, June 5, 2025 12:39:59 AM
To: Jason A. Driscoll <jdriscoll@shapiroarato.com>; SubramanianNYSDChambers <SubramanianNYSDChambers@nysd.uscourts.gov>
Cc: Marc Agnifilo <marc@agilawgroup.com>; thesteellawfirm <thesteellawfirm@msn.com>; nw@westmorelandlawgroup.com <nw@westmorelandlawgroup.com>; xdonaldson <xdonaldson@aol.com>; Anna Estevao <aestevao@harristrz.com>; Alexandra Shapiro <ashapiro@shapiroarato.com>; Comey, Maurene (USANYS) <Maurene.Comey@usdoj.gov>; Johnson, Emily (USANYS) 2 <Emily.Johnson@usdoj.gov>; Slavik, Christy (USANYS) <Mary.Slavik@usdoj.gov>; Steiner, Mitzi (USANYS) <Mitzi.Steiner@usdoj.gov>; Smyser, Madison (USANYS) <Madison.Smyser@usdoj.gov>; Foster, Meredith (USANYS) <Meredith.Foster@usdoj.gov>; Jason A. Driscoll <jdriscoll@shapiroarato.com>
Subject: RE: US v. Combs - Letter re Jane GX

Dear Chambers:

We marked and highlighted the remaining government exhibits in dispute for FRE 106. A corresponding chart is below:

DX 3029 and DX 3030	A-104-13 through A-104-15
DX 3183	A-104-60
DX 3215	A-104-76
DX 3172	A-442-33
DX 3169, p.1-2	A-442-31
DX 3232, p.1-11	A-301-K A-301-L A-301-M
DX 3239, p.1-21.	A-301-R A-301-S A-301-T A-301-U A-301-V

Respectfully,
Teny

From: Jason A. Driscoll <jdriscoll@shapiroarato.com>

Sent: Thursday, June 5, 2025 12:19 AM

To: SubramanianNYSDChambers <SubramanianNYSDChambers@nysd.uscourts.gov>

Cc: Teny Geragos <teny@agilawgroup.com>; Marc Agnifilo <marc@agilawgroup.com>; thesteellawfirm <thesteellawfirm@msn.com>; nw@westmorelandlawgroup.com; xdonaldson <xdonaldson@aol.com>; Anna Estevao <aestevao@harristrz.com>; Alexandra Shapiro <ashapiro@shapiroarato.com>; Comey, Maurene (USANYS) <Maurene.Comey@usdoj.gov>; Johnson, Emily (USANYS) 2 <Emily.Johnson@usdoj.gov>; Slavik, Christy (USANYS) <Mary.Slavik@usdoj.gov>; Steiner, Mitzi (USANYS) <Mitzi.Steiner@usdoj.gov>; Smyser, Madison (USANYS) <Madison.Smyser@usdoj.gov>; Foster, Meredith (USANYS) <Meredith.Foster@usdoj.gov>; Jason A. Driscoll <jdriscoll@shapiroarato.com>

Subject: Re: US v. Combs - Letter re Jane GX

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Chambers,

Attached please find a letter on behalf of Mr. Combs. We will confer with the government regarding appropriate redactions before filing publicly.

Jason A. Driscoll

 **Sab** Shapiro Arato Bach LLP

1140 Avenue of the Americas, 17th Floor

New York, NY 10036

212-257-4898 (o)

jdriscoll@shapiroarato.com

www.shapiroarato.com

This e-mail message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. If you are not the intended recipient, please contact the sender by reply e-mail and destroy all copies of the original message. Thank you.

From: Comey, Maurene (USANYS) <Maurene.Comey@usdoj.gov>

Date: Wednesday, June 4, 2025 at 10:56 PM

To: Subramanian NYSD Chambers <subramaniannysdchambers@nysd.uscourts.gov>

Cc: Teny Geragos <teny@agilawgroup.com>, Marc Agnifilo <marc@agilawgroup.com>, thesteellawfirm <thesteellawfirm@msn.com>, nw@westmorelandlawgroup.com <nw@westmorelandlawgroup.com>, xdonaldson <xdonaldson@aol.com> <xdonaldson@aol.com>, aestevao <aestevao@harristrz.com>, Alexandra Shapiro <ashapiro@shapiroarato.com>, Jason A. Driscoll <jdriscoll@shapiroarato.com>, Johnson, Emily (USANYS) 2 <Emily.Johnson@usdoj.gov>, Slavik, Christy (USANYS) <Mary.Slavik@usdoj.gov>, Steiner, Mitzi (USANYS) <Mitzi.Steiner@usdoj.gov>, Smyser, Madison (USANYS) <Madison.Smyser@usdoj.gov>, Foster, Meredith (USANYS) <Meredith.Foster@usdoj.gov>

Subject: US v. Combs - Letter re Jane GX

Good evening,

Attached please find a letter addressing remaining disputes regarding exhibits the Government intends to use in connection with Jane's testimony. We will confer with the defense regarding appropriate redactions before filing publicly.

Respectfully submitted,

Maurene Comey
Assistant United States Attorney
Southern District of New York
26 Federal Plaza, 37th Floor
New York, NY 10278
212-637-2324
Maurene.Comey@usdoj.gov